
Subject: FW: Artemether-lumefantrin powder for suspension

From: Herwig Jansen [mailto:herwig.jansen@]
Sent: 28 September 2007 12:11
To: Hill, Suzanne
Cc: Olumese, Peter
Subject: FW: Artemether-lumefantrin powder for suspension

TO WHOM IT MAY CONCERN

Recommendations for paediatric formulations of Essential Drugs WHO

Re: Artemether-Lumefantrin in powder for suspension.

Initially rejection was done on the basis of inadequate evidence of efficiency of the proposed dosage form. Since then the results 3 clinical trials were added and in addition the results of a bioequivalence study.

We should like to draw the attention of the committee to what is customary from a regulatory point of view for "generic substances". When a product contains the same active ingredients (and in case of more than one) or same proportions of active ingredients, the difference in pharmaceutical formulation requires the execution of an appropriate Bioequivalence study against the original product. This is also followed by the WHO/Unicef prequalification authority.

Following this recommendation is exactly what Dafra did and the product was shown to be bio-equivalent with the Artemether/lumefantrine tablets from Novartis.

Additional data are not furhte required.

However, in several countries Dafra did do additional clinical studies with this product that is perfectly bioavailable. All three studies show that the product is well tolerated and that the product is efficacious for the treatment of malaria in children.

This should be taken into the general knowledge of what is known on this ACT drug. In terms of efficacy and safety and bioequivalence the drug is equal to the originator product. Although it was not necessary to set up these additional studies from a regulatory point of view, it was done nevertheless.

Therefore the argument about not rigorous randomization etc does not hold.

Concerning the dosage used for the Dafra suspension is given in detail elsewhere (appended) and it is the only way to ensure that every single patient receives the same dose in terms of mg/kg what is not so for the tablet recommendations of Novartis. Hence, the suspension offers a distinct advantage permitting accurate individual dosing.

The document we sent is once more appended. It should bring to an end all arguments on individual dosing. Suggestions about inaccuracy of dosing are not correct since the graduated plastic cylinder cup coming with each bottle permits accurate volume measurements and dosing of each individual child.

We trust that this product: Artemether-Lumefantrine powder for suspension is accepted by the committee as the paediatric formulation of the already existing Essential Drug.

Sincerely yours,

Dr. F.H. Jansen
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